

# EXHIBIT A

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9 *Attorneys for Plaintiffs*

ELI ATTIA AND ELI ATTIA ARCHITECT PC

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*Local Counsel for Plaintiffs*

14 ELI ATTIA AND ELI ATTIA ARCHITECT PC

15 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**  
**FOR THE COUNTY OF SANTA CLARA**

16 ELI ATTIA, AND ELI ATTIA ARCHITECT PC, Case No. 1:14-cv-274103  
17 Plaintiffs,

18 v.

GOOGLE, INC., FLUX FACTORY, INC.,  
19 LARRY PAGE, SERGEY BRIN, SEBASTIAN  
THRUN, ERIC "ASTRO" TELLER, MICHELLE  
KAUFMANN, JENNIFER CARLILE,  
20 AUGUSTO ROMAN, NICHOLAS CHIM, AND  
DOES 1-100,

21 Defendants.

**PLAINTIFF ELI ATTIA'S  
RESPONSES AND OBJECTIONS TO  
DEFENDANT GOOGLE INC.'S FIRST  
SET OF REQUESTS FOR  
PRODUCTION (NOS. 1-89)**

Dept.: 1  
Hearing Judge: Hon. Peter H. Kirwan  
Trial Date: None set

1 DODD CROLEY MAIER LLP at 180 Sansome Street, 17<sup>th</sup> Floor San Francisco , California  
2 94104 on or after the date set for inspection and/or copying.

3 **REQUEST FOR PRODUCTION NO. 80:**

4 All DOCUMENTS and THINGS related to any time YOU filed for bankruptcy.

5 **RESPONSE:**

6 Plaintiff objects to this request as Plaintiff's bankruptcy is not relevant to any of the  
7 claims of defenses in this lawsuit and is not reasonably calculated to lead to the discovery of  
8 admissible evidence.

9 Plaintiff is unable to comply with this request but is willing to meet and confer to discuss  
10 the relevance of the request.

11 **REQUEST FOR PRODUCTION NO. 81:**

12 All DOCUMENTS and THINGS related to any outstanding tax liens against YOU.

13 **RESPONSE:**

14 Plaintiff objects to this request as Plaintiff's outstanding tax liens are not relevant to any  
15 of the claims of defenses in this lawsuit and is not reasonably calculated to lead to the discovery  
16 of admissible evidence.

17 Plaintiff is unable to comply with this request but is willing to meet and confer to discuss  
18 the relevance of the request.

19 **REQUEST FOR PRODUCTION NO. 82:**

20 All DOCUMENTS sufficient to show the amounts of all outstanding judgments, liens, or  
21 other debts outstanding against YOU.

22 **RESPONSE:**

23 Plaintiff objects to this request as Plaintiff's outstanding tax liens, judgments, and/or  
24 debts are not relevant to any of the claims of defenses in this lawsuit and is not reasonably  
25 calculated to lead to the discovery of admissible evidence.

26 Plaintiff is unable to comply with this request but is willing to meet and confer to discuss  
the relevance of the request.

**REQUEST FOR PRODUCTION NO. 83:**

All DOCUMENTS sufficient to show YOUR financial condition, including assets and debts, as of January 1, 2011.

**RESPONSE:**

Plaintiff objects to this request as Plaintiff's financial conditions is not relevant to any of the claims of defenses in this lawsuit and is not reasonably calculated to lead to the discovery of admissible evidence.

Plaintiff is unable to comply with this request but is willing to meet and confer to discuss the relevance of the request.

**REQUEST FOR PRODUCTION NO. 84:**

All DOCUMENTS sufficient to show all payments made to YOU since your inception.

**RESPONSE:**

Plaintiff objects to this request to the extent it seeks "*all* documents sufficient to show *all* payments" as overly broad and unduly burdensome as the request is not limited in time, the scope of this lawsuit, or specify whom the payments are made by. Plaintiff further objects to this request as it does not describe with reasonable particularity each item or category of items to be inspected. Plaintiff further objects that this request seeks documents of payments to plaintiff made by parties and concerning subjects that are not relevant and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request as vague and ambiguous with regard to the phrase "since your inception" when directed toward an individual person.

Plaintiff will not comply with this request, but is willing to meet and confer to discuss the scope and relevance of this request.

**REQUEST FOR PRODUCTION NO. 85:**

All DOCUMENTS and THINGS you will or may use as evidence at trial in this matter.

**RESPONSE:**

Plaintiff objects to this request as it encompasses documents that are protected under the attorney work-product doctrine.

1 Dated: June 12, 2017

**BUETHER JOE & CARPENTER, LLC**

2  
3 /s/ 

4 Eric W. Buether  
5 Christopher M. Joe  
6 Brian A. Carpenter  
7 Niky Bukovcan  
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14 Jamie L. Dupree (#158105)  
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21 **Attorneys for Plaintiffs**  
22 **Eli Attia and Eli Attia Architect PC**  
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15 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**  
**FOR THE COUNTY OF SANTA CLARA**

16 ELI ATTIA, AND ELI ATTIA ARCHITECT PC, Case No. 1:14-cv-274103

17 Plaintiffs,

18 v.

GOOGLE, INC., FLUX FACTORY, INC.,  
19 LARRY PAGE, SERGEY BRIN, SEBASTIAN  
THRUN, ERIC "ASTRO" TELLER, MICHELLE  
KAUFMANN, JENNIFER CARLILE,  
20 AUGUSTO ROMAN, NICHOLAS CHIM, AND  
DOES 1-100,

21 Defendants.

**PLAINTIFF ELI ATTIA ARCHITECT  
PC'S RESPONSES AND OBJECTIONS  
TO DEFENDANT GOOGLE INC.'S  
FIRST SET OF REQUESTS FOR  
PRODUCTION (NOS. 1-89)**

Dept.: 1

Hearing Judge:

Trial Date:

Hon. Peter H. Kirwan

None set

1 to the 927 Industrial Avenue, Palo Alto, CA 94303 property. It is unclear at this time to Plaintiff  
2 how this property is relevant to the claims or defenses in this action, and furthermore how *all*  
3 agreements to that property, such as utility bills, internet bills, or leases are relevant to the claims  
4 or defenses live in this suit.

5 Plaintiff is unable to comply with this request, but is willing to meet and confer to narrow  
6 the scope and discuss the relevance of this request.

7 **REQUEST FOR PRODUCTION NO. 80:**

8 All agreements between YOU and Peter A. Marchetto, Mike Riddle, Jerry Wind, Richard  
9 Meier, AECOM, ARUP, Trammell Crow Company, CBRE, Joshua L. Green, Gensler, Hines,  
10 KPF, Perkins Eastman, Turner Construction or CBM Engineering.

11 **RESPONSE:**

12 Plaintiff objects to this request in seeking “*all* agreements” in that it is overly broad and  
13 unduly burdensome in that it is not limited in time or scope to the claims or defenses present in  
14 this lawsuit.

15 Plaintiff will comply with this particular demand for inspection and/or copying of  
16 documents and things, by producing agreements that are relevant to the scope of this lawsuit, by  
17 making them available for inspection and/or copying at the offices of FUTTERMAN DUPREE  
18 DODD CROLEY MAIER LLP at 180 Sansome Street, 17<sup>th</sup> Floor San Francisco , California  
19 94104 on or after the date set for inspection and/or copying.

20 **REQUEST FOR PRODUCTION NO. 81:**

21 All DOCUMENTS and THINGS related to any time YOU filed for bankruptcy.

22 **RESPONSE:**

23 Plaintiff objects to this request as Plaintiff’s bankruptcy is not relevant to any of the  
24 claims of defenses in this lawsuit and is not reasonably calculated to lead to the discovery of  
25 admissible evidence.

26 Plaintiff is unable to comply with this request but is willing to meet and confer to discuss  
the relevance of the request.



1 **REQUEST FOR PRODUCTION NO. 82:**

2 All DOCUMENTS and THINGS related to any outstanding tax liens against YOU.

3 **RESPONSE:**

4 Plaintiff objects to this request as Plaintiff's outstanding tax liens are not relevant to any  
5 of the claims of defenses in this lawsuit and is not reasonably calculated to lead to the discovery  
6 of admissible evidence.

7 Plaintiff is unable to comply with this request but is willing to meet and confer to discuss  
8 the relevance of the request.

8 **REQUEST FOR PRODUCTION NO. 83:**

9 All DOCUMENTS sufficient to show the amounts of all outstanding judgments, liens, or  
10 other debts outstanding against YOU.

11 **RESPONSE:**

12 Plaintiff objects to this request as Plaintiff's outstanding tax liens, judgments, and/or  
13 debts are not relevant to any of the claims of defenses in this lawsuit and is not reasonably  
14 calculated to lead to the discovery of admissible evidence.

15 Plaintiff is unable to comply with this request but is willing to meet and confer to discuss  
16 the relevance of the request.

16 **REQUEST FOR PRODUCTION NO. 84:**

17 All DOCUMENTS sufficient to show YOUR financial condition, including assets and  
18 debts, as of January 1, 2011.

18 **RESPONSE:**

19 Plaintiff objects to this request as Plaintiff's financial conditions is not relevant to any of  
20 the claims of defenses in this lawsuit and is not reasonably calculated to lead to the discovery of  
21 admissible evidence.

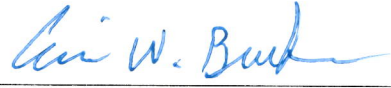
22 Plaintiff is unable to comply with this request but is willing to meet and confer to discuss  
23 the relevance of the request.

24 **REQUEST FOR PRODUCTION NO. 85:**

25 All DOCUMENTS sufficient to show all payments made to YOU since your inception.

1 Dated: June 12, 2017

**BUETHER JOE & CARPENTER, LLC**

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